IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI FILED SOUTHERN DIVISION

DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

ARTHUR JOHNSTON

VAUGHN PERRET, CHARLES LEARY & DANIEL ABEL, D/B/A/ TROUT POINT LODGE LTD OF NOVA SCOTIA & IN THEIR INDIVIIDUAL CAPACITIES PROGRESS MEDIA GROUP LIMITED, MARILYN SMULDERS, & ASHOKA

RESPONSE IN OPPOSITION TO LEARY'S LATEST MOTION FOR CONTINUANCE (ECF# 342)

Plaintiff/Counter-Defendant Douglas Handshoe respectfully submits this response in opposition to Charles Leary's latest Motion for a Continuance (ECF# 342) of pre-trial Conference and scheduled hearing and he will show that Mr. Leary's Motion should be denied.

Mr. Leary's Motion should be denied for several reasons, including but not limited to that the Motion continues an established pattern of dilatory conduct by Leary designed to delay the resolution of this matter.

These matters are more fully discussed in the accompanying Memorandum that is contemporaneously filed with this Opposition.

Attached to this Opposition are the following Exhibits:

Exhibit 1 - Declaration of Douglas Handshoe

Exhibit 2 – In Re: Slabbed New Media, LLC Docket #34

Exhibit 3 – Leary email to the Court dated January 17, 2019.

Respectfully submitted this 22nd day of January, 2019,

Plaintiff / Counter-Defendant

Douglas Handshoe

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CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on January 22, 2019 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

Respectfully submitted this 22nd day of January, 2019,

Douglas Handshoe

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